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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, DC 20544

In the Matter of

Replacement of Part 90
by Part 88 to Revise
the Private Land Mobile
Radio Services and Modify
the Policies Governing them.

PR Docket 92-235

To: The Commission

COMMENTS

HLUSKA Enterprises Inc submits its comments
in response to the Commission's notice of Proposed Rule Making in this
proceeding, concerning:

1. Power Restrictions on Fixed Stations at Higher Elevations.
2. Channel Splitting.
3. Frequency Stability.
4. Consolidation of Private Land Mobile Radio Services.

Complete comments are provided on the following page.

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List A B C D E

1. Power Restrictions: This proposal, which would require licensees to reduce power depending on height above average terrain, is a two dimensional solution to a three dimensional problem that will not work and that we strongly oppose.

In most cases, high elevation transmitter sites are surrounded by natural obstacles such as other mountains. Environmental, economic and zoning concerns often prohibit use of the best transmitter site. Consequently, many transmitters are located miles away from the desired coverage area. To compensate for these factors, a licensee must use sufficient power to cope with geographic realities.

Air pollution and other exogenous factors can cause a dramatic loss of signal strength at the mobile receiver. Losses of 20 to 30 DB are frequently noted in the Los Angeles area during periods of high air pollution. Snow and ice on the antenna in winter can decrease the performance of the system as can foliage and trees during the growth season. Conditions around the receiver -- which, in a mobile unit, change continually -- often restrict reception. Clearly, radio systems must be designed to include sufficient reserve gain to have the dynamic range to reach its mobile receivers undiminished by variable environmental factors.

Under the Commission's proposal, specifying licensed output in terms of effective radiated power (ERP) would impose a subjective theoretical standard on the real world where it well may not be applicable. Line loss, antenna gain and directional distortions caused by the tower on which the antenna is mounted often will severely distort the realities of the equation.

At the present time, the mobile area of operation for many licensees is 75 miles around a base station or repeater. As this fact is recognized in existing licenses, the FCC should permit licensees to use adequate power to cover the area of operation specified in the license unaffected by ~~to the~~ the ~~unreasonably low~~ power ~~limits~~

We oppose implementation of channel spacings of 5 and 6.25 khz on the 150 to 512 bands until: such standards have been proven on the 220 band; an industry consensus has emerged for technology that meets these standards; and, manufacturers have proven equipment ready to be marketed.

4. Frequency Coordination: The Commission's proposal, which would cut the number of coordinators from 19 to three, would wreak havoc on the frequency